



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029



SDMS DocID

2068828

VIA FEDERAL EXPRESS

December 2, 1999

ORIGINAL

Springridge Management Corporation c/o
The Law Offices of Paul Boni
Paul Boni, Esq.
Constitution Place - Suite 1109
325 Chestnut Street
Philadelphia, PA 19106

**RE: Malvern TCE Site - Springridge Management Corporation -
Supplement to Lien Filing Record - Docket # CERC-III-98-011L**

Dear Counselor Boni:

Enclosed please find a supplement to the Lien Filing Record ("LFR") for the above-referenced matter. An updated index to the LFR is also enclosed.

Should you require any additional information in regard to the enclosed materials, please contact me at (215) 814-2665.

Sincerely,

Michael H. Frankel
Senior Paralegal Specialist

Enclosures

cc: Benjamin Kalkstein, Esq. (3RC00)

~~Benjamin Cohen, Esq. (3RC41)~~

ORIGINAL

SUPERFUND LIEN TRACKING COVER SHEET

SITE NAME: Malvern TCE

Springdale Prop

CERC-
DOCKET # ETI-98-011

ORIGINAL FILED W/ HEARING CLERK _____

UPDATE ✓ 12/2/99

ATTORNEY BCohen / M Fawcett

LIEN AMOUNT \$ _____

RECEIVED
99 DEC -2 PM 4:11
REGIONAL HEARING CLERK
EPA, REGION III, PHILA, PA

NOTICE LETTER SENT - DATE - _____

REQUEST FOR HEARING - DATE RCV'D _____

HEARING - PRESIDING OFFICER ASSIGNED _____

HEARING DATE _____

HEARING - PRESIDING OFFICER'S DETERMINATION

LIEN PERFECTION FILED - DATE _____

LIEN WITHDRAWN - DATE _____

LIEN SATISFIED - DATE _____

CERTIFICATE OF SERVICE

I hereby certify that a copy of the documents which comprise the Supplement to the Lien Filing Record and the supplemented Index to the Lien Filing Record, dated December 1, 1999, was sent to each of the following persons:

Via Federal Express:

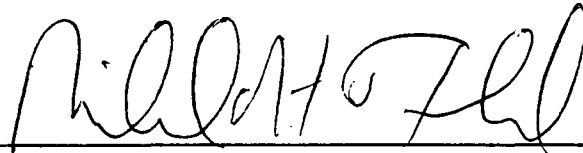
Springridge Management Company c/o
The Law Office of Paul Boni
Constitution Place - Suite 1109
325 Chestnut Street
Philadelphia, Pennsylvania 19106

By Hand-Delivery:

Benjamin Kalkstein
Regional Presiding Officer
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103

Benjamin Cohan
Senior Assistant Regional Counsel
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103

Lydia Guy
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103



Michael H. Frankel
Senior Paralegal Specialist
U.S. EPA, Region III

12/2/99
Date

Lien Filing Record for the Malvern TCE Site
Springridge Property

ORIGINAL

Index of Documents

Supplemented 1/28/99
Supplemented 5/19/99
Supplemented
& Revised 5/25/99
Addendum added 6/18/99
Supplemented 11/23/99
Supplemented 12/1/99

Property Documents

- 1) Deed transferring ownership from Phillip P. Matthews and Margaret C. Lank Matthews, to Henry Lloyd Balderston, Ruth K. Balderston, dated July 1, 1949.
- 2) Deed transferring ownership from Ruth K. Balderston to Chemclene Corporation, Chester County, Pennsylvania, Recorder of Deeds book 2151 pg. 168, dated March 30, 1990.
- 3) Indenture in the amount of \$10,000.00 Between Ruth K. Balderston {Grantor} and Chemclene Corporation {Grantee}, dated March 30, 1990.
- 4) Deed transferring ownership from Ruth K. Balderston to Springridge Management Corporation, Chester County, Pennsylvania, Recorder of Deeds, book 3898/ pg 2023-2028, dated April 24, 1995.
- 5) Site Parcel Map from Booz-Allen & Hamilton, Received June 11, 1996.

Cost Documentation

- 1) Itemized Cost Summary Report, for Malvern TCE Site, Report Date July 22, 1996 with attached memo by Millie DeLeon-Ramos, US EPA, Cost Recovery Specialist.
- 2) Itemized Cost Summary Report, for Malvern TCE Site, Report Date December 19, 1997.
- 3) Cost Summary Report, for Malvern TCE Site, Report Date August 7, 1998, with attached memo by Leslie Vassalo, US EPA, Cost Recovery Specialist.
- 4) Memorandum from US EPA Linda Dietz, Remedial Project Manager, to US EPA Sheila Briggs-Steuteville listing the estimated future costs, dated January 23, 1997.

Region III Documents & Lien Filing Preparations

- 1) Memorandum from US EPA Linda Dietz to US EPA Sheila Briggs-Steuteville, requesting the Office of Regional Counsel prepare a lien filing for Chemclene Corporation the Malvern TCE Site, dated 1/14/97.
- 2) EPA Site Inspection Report, by Gregg Crystall, Ecology & Environment, Inc., Dated July 9, 1982.
- 3) Superfund Program Record of Decision, Malvern TCE Site, by US EPA, Region III, dated November 26, 1997.
- 4) Remedial Investigation Report for Malvern TCE Site, prepared by CH2M Hill for US EPA, dated January 1997, with attachments.
- 5) Malvern TCE Site Feasibility Study, by Linda Dietz, US EPA, Remedial Project Manager, dated June 4, 1997.
- 6) General Notice of Liability Letter, to: Chemclene Corporation, Mr. Lloyd Balderston, from: Abraham Ferdas, US EPA, dated December 14, 1993.
- 7) Memorandum from Sheila Briggs-Steuteville US EPA, to Marcia Mulkey US EPA, Regional Counsel, Re: Notice of Opportunity to be Heard/Notice of Lien, undated.
- 8) Letter from Marcia Mulkey, US EPA, Region III, Regional Counsel, to Chemclene Corporation, Mr. W. Lloyd Balderston, Re: Notice of Opportunity to be Heard prior to perfection of lien, dated March 4, 1997.
- 9) Letter to Clerk of the U.S. District Court for the Eastern District of Pennsylvania, Mr. Michael Kunz, from Ben Fields, US EPA, Re: Perfection of Lien filing, w/attached Request to File Lien, undated.
- 10) Letter to the Office of the Prothonotary of Chester County, from Ben Fields, US EPA, Re: Perfection of Lien filing, undated.
- 11) NOTICE OF LIEN, on property owned by Chemclene, signed by Marcia Mulkey, Regional Counsel, Region III, US EPA, Notarized, dated June 19, 1997.
- 12) Memorandum from US EPA Linda Dietz to US EPA Joan A. Johnson Re: Requesting the Office of Regional Counsel to prepare a lien filing for Springridge Management Corporation, for the Malvern TCE Site, dated June 11, 1998.

13) Letter from Abraham Ferdas, Director, Hazardous Site Cleanup Division, US EPA, to Springridge Management Corporation, Re: Notice of Liability ("General Notice") "Special Notice" for Negotiations for Remedial Design & Remedial Action/Demand for payment of Costs, dated August 4, 1998.

14) Letter from William C. Early, Acting Regional Counsel, US EPA, to Springridge Management Corporation, Re: Notice of Lien/Notice of Opportunity to be Heard, dated August 26, 1998.

15) US EPA Final Policy Toward Owners of Contaminated Aquifers, with accompanying memorandum by Bruce M. Diamond, US EPA, Director, Office of Site Remediation, dated May 24, 1995 with accompanying Federal Register Notice.

16) Letter to Chemclene Corporation, Lloyd Balderston, from Pennsylvania Department of Environmental Resources, Frank Holmes, Re: Hazardous Waste Inspection, dated August 27, 1981.

17) Hazardous Waste Inspection Report, Chemclene Corporation, by Pennsylvania Department of Environmental Resources, Frank Holmes, dated August 5, 1981.

18) Letter to Chemclene Corporation, Lloyd Balderston, from Pennsylvania Department of Environmental Resources, Frank Holmes, Re: Hazardous Waste Inspection, dated April 13, 1982.

19) Hazardous Waste Inspection Report, Chemclene Corporation, by Pennsylvania Department of Environmental Resources, Frank Holmes, dated April 8, 1982.

20) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Frank Holmes, dated October 25, 1983.

21) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Frank Holmes, dated January 26, 1984.

22) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Frank Holmes, dated April 18, 1984.

23) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Frank Holmes, dated April 2, 1984, with attached US EPA memo, dated April 18, 1984.

24) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Frank Holmes, dated July 18, 1984.

ORIGINAL

25) RCRA Compliance Inspection Report, Chemclene Corporation, by Gerard W. Crutchley, U.S. US EPA, Engineering Technician, dated February 25, 1985 with attached US EPA memo, dated April 16, 1985.

26) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Frank Holmes, dated April 16, 1985, with attached US EPA memo, undated.

27) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Frank Holmes, dated April 17, 1985.

28) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Brian Boyd, dated August 25, 1988, with attached US EPA memo, dated November 11, 1988.

29) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Brian Boyd, dated November 18, 1988, with attached US EPA memo, dated February 24, 1989.

30) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Paul V. Panek, dated May 17, 1990.

31) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Paul V. Panek, dated January 14, 1991.

32) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Paul V. Panek, dated March 19, 1991.

33) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Paul V. Panek, dated March 20, 1991.

34) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, April Flipse, dated June 25, 1992.

35) Letter to Chemclene Corporation, Lloyd Balderston, from Pennsylvania Department of Environmental Resources, Frank Holmes, Re: Hazardous Waste Inspection, dated April 13, 1982.

36) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, April Flipse, dated August 31, 1992.

ORIGINAL

37) Facility Inspection Letter Report, Chemclene Corporation, by CDM Federal Programs Corporation, Bruce R. Pluta, Work Assignment Manager, Prepared for US EPA, dated September 28, 1990.

38) US EPA, Record of Communication, Phone Call to Frank Holmes, Pennsylvania Department of Environmental Resources, from Bill Walsh, US EPA, RCRA Compliance, Re: Followup on August 5, 1981, Inspection of Chemclene Corporation, dated May 14, 1982.

39) Letter to Chemclene Corporation, Lloyd Balderston, from Pennsylvania Department of Environmental Resources, Frank Holmes, Re: Hazardous Waste Inspection, dated January 5, 1983.

40) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Frank Holmes, dated January 3, 1983.

41) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Frank Holmes, dated July 9, 1984.

42) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, James Stuesiling, dated September 6, 1985.

43) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Mark Bonenberger, dated April 16, 1987.

44) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Mark Bonenberger, dated April 20, 1987.

45) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, D. Richard Shipman, dated May 19, 1987.

46) Final Report Chemclene Corporation F-Solvent Land Disposal Restrictions Inspection, by CDM Federal Programs Corporation, Bruce R. Pluta, Work Assignment Manager, Prepared for US EPA, dated August 5, 1987.

47) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Mark Bonenberger, dated August 31, 1987.

48) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Mark Bonenberger, dated September 4, 1987.

49) Hazardous Waste Inspection Report for Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Bureau of Waste Management, Mark Bonenberger, dated December 30, 1987.

50) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Mark Bonenberger, dated January 12, 1988.

51) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Brian Boyd, dated May 23, 1988.

52) Notice of Violation, issued to Chemclene Corporation, by the Pennsylvania Department of Environmental Resources, Brian Boyd, dated September 13, 1988.

53) Letter to Joan A. Johnson, Assistant Regional Counsel, US EPA, from Paul Boni, Esq., attorney for Springridge Management, Re: Objection to EPA's Notice of Intent to File Lien - Malvern TCE Superfund Site, dated October 15, 1998.

54) Letter to Springridge Management Company, Mr. Lloyd Balderston - Chief Executive Officer, from William C. Early, Acting Regional Counsel, US EPA, Re: Revised Notice of Superfund Lien/Opportunity to be Heard, dated March 6, 1999, with signed Certified Mail return card, dated March 9, 1999.

55) Letter to Michael H. Frankel, Paralegal Specialist, US EPA, from Paul Boni, Esq., Counsel for Springridge Management, Re: Revised Notice of Intent to File Lien; Malvern TCE Superfund Site, dated March 26, 1999.

56) Order of Assignment, Docket No. CERC-III-98-011L, designating Benjamin Kalkstein as Presiding Officer, signed by Lydia Isales, Acting Deputy Regional Counsel, dated Mmmmmay 11, 1999.

57) Guidance on Federal Superfund Liens, from Thomas L. Adams, Jr., Assistant Administrator, US EPA, to Regional Administrators, Regional Counsels, Directors Waste Management Division, US EPA Regions I-X, dated September 22, 1987.

58) Supplemental Guidance on Federal Superfund Liens, OSWER Directive Number 9832.12-1a, dated July 29, 1993.

59) Memorandum from Maria Parisis-Vickers, U.S. EPA, Associate Director for RCRA Programs, to Thomas C. Voltaggio, U.S. EPA, Hazardous Waste Management Division, Re: Chemclene Corporation/Malvern TCE Transfer of Project from RCRA to CERCLA, dated November 3, 1993.

60) Letter to Springridge Management Company, Mr. Lloyd Balderston - Chief Executive Officer, from William C. Early, Acting Regional Counsel, US EPA, Re: Revised Notice of Superfund Lien/Opportunity to be Heard - Additional Parcel of Land, dated July 27, 1999.

61) Letter to Michael H. Frankel, U.S. EPA, from Paul Boni, Esq., Re: Objections to EPA's Revised Notice of Lien, dated July 27, 1999.

62) Letter to Springridge Management Corporation c/o Paul Boni, Esq., from William C. Early, U.S. EPA, Acting Regional Counsel, Re: Withdrawal of Notice of Lien on Chester County, Pennsylvania Tax Assessors Parcel 42-3-17.3, dated August 25, 1999.

63) U.S. EPA's Prehearing Exchange, Docket # CERC-III-98-011L, with attached transmittal memo, dated September 29, 1999.

64) U.S. EPA's 1st Supplement to the Prehearing Exchange, Docket # CERC-III-98-011L, with attached transmittal letter dated November 30, 1999.

65) Joint Stipulation by U.S. EPA and Counsel for Springridge Management Corporation, Docket # CERC-III-98-011L, signed November 17, 1999 and November 22, 1999, with attached transmittal letter dated November 22, 1999.

66) Letter to Lloyd Balderston, Chemclene Corporation, from Katherine A. Lose, Corrective Action RCRA Enforcement Section, U.S. EPA, Re: RCRA Facility Investigation Data Gaps, dated November 14, 1991.

67) Letter to W. Lloyd Balderston, Chemclene Corporation, from Robert E. Greaves, Chief, RCRA Enforcement/UST Branch, U.S. EPA, Re: RCRA 3008(h) Corrective Action Order, Docket # RCRA-III-010-CA, RCRA Facility Investigation, dated June 5, 1992.

68) Memorandum to File, from Maureen Essenthier, Project Manager, PA Corrective Action Section, U.S. EPA, Re: Meeting Notes - Proposed Transfer of Chemclene Corporation to CERCLA, dated June 30, 1992.

69) Letter to W. Lloyd Balderston, Chemclene Corporation, from Christopher Pilla, Chief, PA Corrective Action Section, U.S. EPA, Re: RCRA 3008(h) Corrective Action Order, Docket # RCRA-III-010-CA, RCRA Facility Investigation, dated August 21, 1992.

70) Letter to W. Lloyd Balderston, Chemclene Corporation, from Maureen Essenthier, PA Corrective Action Section, U.S. EPA, Re: RCRA 3008(h) Corrective Action Order, Docket # RCRA-III-010-CA, RCRA Facility Investigation, dated June 28, 1993.

71) Letter to W. Lloyd Balderston, Chemclene Corporation, from Maureen Essenthier, PA Corrective Action Section, U.S. EPA, Re: RCRA 3008(h) Corrective Action Order, Docket # RCRA-III-010-CA, RCRA Facility Investigation, dated September 20, 1993.

Respondents Exhibits and Filings

- 1) Exhibit # 1, Federal Register Notice of DeMinimis Settlement - Request for Public Comment, Volume 64, Number 129, Page 36685 from the Federal Register Online, FRL-6373-6, dated July 7, 1999 with attached transmittal letter to Benjamin Cohan, U.S. EPA, from Paul Boni, Esq., Re: Respondent's entry of Exhibits, dated September 29, 1999.
- 2) Exhibit # 2, Federal Register Notice of Lodging of Consent Decree, Volume 64, Number 188, Page 52527, from the Federal Register Online, FR Doc. 99-25343, filed September 28, 1999 with attached Certificate of Service, dated September 29, 1999.
- 3) Exhibit # 3, Malvern TCE - De Maximis Parties Consent Degree - U.S. v. Action Manufacturing, et al., with attachments.
- 4) Letter to Benjamin Cohan, U.S. EPA, from Paul Boni, Esq., Re: Entering De Maximis Consent Decree as Respondent's Exhibit # 3 which includes the Malvern TCE De Minimis Settlement Document as an attachment, dated October 12, 1999.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

ORIGINAL

Benjamin M. Cohan
U.S. EPA Region III
Office of Regional Counsel
(3RC41)
1650 Arch Street
Philadelphia PA 19103
(215) 814-2618 (tel.)
(215) 814-2603 (fax)

NOV 30 1999

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Paul Boni, Esq.
Constitution Place
Suite 1109
325 Chestnut St.
Phila. PA 19106

BY HAND DELIVERY

Judge Benjamin Kalkstein
U.S. EPA
1650 Arch Street
Philadelphia, PA 19103

Re: Malvern TCE Site -- CERCLA Lien Proceeding (Docket No. CERC-III-11L)

Dear Gentleman :

Please find enclosed a true and correct copy of EPA's 1st Supplemental Prehearing Exchange in the above captioned matter.

Sincerely,


Benjamin M. Cohan
Senior Assistant Regional Counsel

cc: Lydia Guy (3RC00)
Joan Johnson (3RC41)
Michael Frankel (3RC41)

ORIGINAL

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, PA 19130

IN THE MATTER OF: :
: Docket No. CERC-III-98-011L
Malvern TCE Superfund Site :
(Lien Hearing with respect to :
property owned by Springridge :
Management Company) :
:
:
PROCEEDINGS UNDER SECTION :
107(1) of CERCLA, as amended, :
42 U.S.C. § 9607(1) :
:

EPA'S 1st SUPPLEMENTAL PREHEARING EXCHANGE

Pursuant to the Regional Judicial and Presiding Officer's letter of September 2, 1999, The Environmental Protection Agency (EPA), hereby supplements its Prehearing Exchange as follows:

I. A. Expected Witnesses for the Complainant: :

1) Maureen Essenthier, RCRA Project Manager, EPA Region III. Ms. Essenthier will testify regarding Mr. Lloyd Balderston's failure to cooperate with EPA and complete the December 1998 RCRA Administrative Order on Consent which such failure has contributed to an on-going release of contaminants to ground water beneath property currently owned by Springridge Management Company.

B. Documents or Exhibits to be Offered

1. EPA's Lien Filing Record, as revised December 1, 1999 (including revisions made on November 23, 1999).

Respectfully Submitted,


Benjamin M. Cohan
Senior Assistant Regional Counsel

R - III Filings - Exhibit # 64
Malvern TCE - Springridge Mgmt
Lien Record CERC-III-98-0111L

LAW OFFICES OF PAUL BONI, P.C.

ENVIRONMENTAL LAW

ORIGINAL

CONSTITUTION PLACE, SUITE 1109
325 CHESTNUT STREET
PHILADELPHIA, PA 19106
(215) 989-0034
FAX: (215) 989-0035

paulboni@earthlink.net

RECEIVED

ONE GREENTREE CENTRE, SUITE 201
MARLTON, NJ 08053
(856) 988-1133
FAX: (856) 596-8359

NOV 23 1999

EPA, Region III, ORG
Site Remediation Branch
NOVEMBER 22, 1999

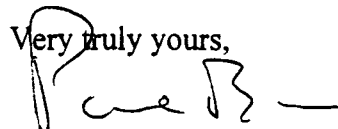
Benjamin Cohan, Esquire
U.S. Environmental Protection Agency, Region III
Office of Regional Counsel
1650 Arch Street; Mail Code: 3RC41
Philadelphia, PA 19103-2029

Re: CERCLA Lien Proceeding (CERC-III-0111)

Dear Ben:

I enclose an executed Joint Stipulation. Thank you for taking the lead on this document.

Very truly yours,



Paul Boni

Encl.

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, PA 19130

IN THE MATTER OF:

Malvern TCE Superfund Site
(Lien Hearing with respect to
property owned by Springridge
Management Company)

:Docket No. CERC-III-98-011L

PROCEEDINGS UNDER SECTION
107(1) of CERCLA, as amended,
42 U.S.C. § 9607(1)

JOINT STIPULATION

The United States Environmental Protection Agency and Springridge Management Company (SMC) hereby stipulate to the following facts:

1. SMC is the owner of the property which is the subject of the above captioned lien proceeding.
2. SMC was sent notice of potential liability by certified mail.
3. The property is subject to or affected by a removal or remedial action.
4. The United States has incurred response costs with respect to a response action under CERCLA.

IT IS SO AGREED:

FOR EPA

Benjamin M. Cohan
Senior Assistant Regional Counsel
U.S. EPA Region 3

Date _____

11/17/99

FOR SPRINGRIDGE MANAGEMENT COMPANY

Paul Boni, Esq.
Counsel to SMC

Date _____

11/22/99

K - III Filings - Exhibit # 65
Malvern TCE - Springridge Mgmt
Lien Record CERC-III-98-0111L

15945
ORIGINAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107



NOV 14 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lloyd Balderston
Chemclene
258 N. Phoenixville Pike
Malvern, PA 19355

RE: RCRA Facility Investigation Data Gaps

Dear Mr. Balderston:

EPA has received the proposal dated September 10, 1991 for the placement of the upgradient well and the soil sample locations. As part of the review, we have conducted an overview of the work completed to date to determine if there is sufficient information to determine the horizontal and vertical extent of the contamination. There are a number of data gaps which need to be fulfilled before a corrective measure can be selected.

GROUNDWATER

As stated in previous correspondence and in conversations, the RCRA Facility Investigation (RFI) must delineate the extent of on-site as well as off-site contamination. The RFI Workplan states that analysis conducted at the Catanach Quarry north in-flow revealed 200 ppb of TCE. To date, Chemclene has not located, installed, and/or sampled any wells between the Chemclene property and the quarries, and in turn, the extent of the TCE plume has not been defined. If Chemclene concedes that their plant is responsible for the TCE contamination at the Catanach Quarry, then the Corrective Measures Study must address means to remediate the off-site contamination. Without sufficient sampling and analytical data of off-site groundwater, this will be an impossible task.

Chemclene must identify off-site wells in the northeast direction between Chemclene and the Catanach and Cedar Hollow quarries. Once these wells are identified, the location of these wells must be submitted to EPA for approval as appropriate sampling locations, and immediately thereafter, Chemclene must obtain the necessary rights to sample these well(s). In the event that Chemclene is unsuccessful in identifying these off-site well(s), EPA is initially requiring Chemclene to install a series of 5 wells (one every 1000 feet), along the NE/SW strike between Chemclene's property and the Catanach Quarry. Rationale for siting of wells is provided in a previous letter dated February

20, 1991. A copy of this correspondence is attached to this letter.

In addition, EPA is requiring a bedrock well to be located midway between Well # CC-5 and the well at house # 41 (identified on Figure #9 of the RFI Workplan dated July 19, 1989). This is based in part upon the concentration of TCE in House Well #41 of 190 ppb (July 80) and a concentration of 990 ppb in CC-5. It appears that CC-5 and House Well #41 may be aligned along a highly conductive groundwater flow path and therefore EPA requires an additional well to determine if there is hydraulic communication between these two points.

The proposed location for well CC-14 identified on Figure 1, is acceptable. In the event that elevated levels are detected in this well, EPA will consider this well as an additional monitoring well, and another upgradient well will be required.

DOMESTIC WATER

The eleventh bimonthly progress report provided the analytical summaries for the sampling of the residential wells in March, 1991. The report lacked the analytical summaries for residential wells # 19, 20 and 41 which were delineated as wells to be sampled in the approved RFI workplan. In addition, the RFI Report must demonstrate that QA/QC procedures, holding times, etc. were adhered to for sampling and analysis of the domestic wells.

A revised potentiometric map must be provided with the RFI using data from the residential wells and other off-site wells. In the RFI Workplan there is a potentiometric map for these locations, so these residential wells should have been surveyed previously.

To date, EPA has received minimal information concerning Aqua-Pure Laboratories servicing of the filters on the residential wells. A copy of the contract between Chemclene and Aqua-Pure, and a brief report on work conducted to date under this contract must be provided to EPA. Chemclene must substantiate that the carbon filters supplied to the resident(s) are not experiencing any breakthrough.

The RFI Workplan which was approved, anticipated that the work would be complete in January 1991. Since the work is still ongoing, EPA is requiring that Chemclene conduct another round of sampling from the residential wells to include the following resident numbers taken from Figure 9 of the RFI Workplan dated July 19, 1989: #10, 23, 65, 20, 19, 15, 64, 45, 3, 42, 33, 36, 41, 43, 44, 4, 52, 53, 56, 9, 58,

SOIL AND SURFACE WATER SAMPLING

PLANT AREA - The seventh bimonthly progress report identifies the locations of soil borings in the plant area. In addition to conducting OVA scanning at each of these locations, the Workplan, dated July 19, 1989, stated that a minimum of one to two samples would be collected and analyzed for VOC's. Once again, Chemcene must provide the laboratory summaries for this sampling event. In addition, the RFI Report must demonstrate that QA/QC procedures, holding times, etc. were adhered to for all sampling and analysis.

To date, the horizontal and vertical extent of the soils contamination has not been defined. The revised sampling plan outlined in your letter dated September 10, 1991 is insufficient to determine the extent of the soils contamination. Figure 2 of the proposed plan dated September 10, 1991 shows Boring Locations B-3 thru B-6 along the perimeter of the previous U.S.T., whereas former figures identify the boring locations within the area which was previously occupied by U.S.T. This discrepancy must be clarified.

PLANT AND MOUNDED AREA

It must be emphasized that a soil gas survey is merely a screening device. Once completed, we will hopefully have defined the extent of the soil contamination. The results will give us a ball park number of the level of contaminants that exist in the soils. Additional sampling and analysis to define the actual concentration in the soils must be conducted as well. Previous studies using soil gas surveys to determine actual concentrations in the soil are inconclusive. Some studies have shown a direct correlation, where as others have shown a limited correlation. The soil gas survey, when conducted properly, can be a valuable evaluation tool for determining the practicality of utilizing soil vapor extraction as a Corrective Measure Alternative.

Although the soil gas survey is applicable in screening for VOC's, the proposed sampling plan is limited in scope. Also, it must be viewed as the first phase of sampling to delineate the horizontal and vertical extent of the contamination.

The soil gas survey proposal must be revised to include an evaluation of the horizontal extent of contamination. One method could include starting at the proposed locations identified in Figures 1 and 2, attached to your letter dated September 10, 1991, and then moving in a south, east, north,

and west direction to provide an estimate of the extent of contamination. One method to determine the extent of the horizontal contamination is to conduct the soil gas survey at shallower depths (4 to 6 feet), then repeating the survey at greater depths, based on levels in the shallow horizons. The survey must be conducted to a depth just above the water table. Based on previous water levels, this could be as deep as 75 feet in the plant area and 50 feet in the Mounded Area.

The soil gas survey must include a more thorough evaluation of not only the former underground storage tank area but also the loading dock area. We only have limited data to a depth of seven feet for this area from borings conducted in January of 1990. Once again, the soil gas survey proposal must be revised to allow for the collection of sufficient data to delineate the horizontal and vertical extent of the soil contamination in this area.

Once the soil gas survey is completed and the extent of the plume is delineated, a second phase is required which entails conducting soil borings in the contaminated area as well as along the perimeter of the contaminated area to determine actual concentrations in the soil. Procedures to minimize migration of contaminants by properly sealing/grouting the borings must be provided in the sampling plan as well as an estimate of number of borings which will be required to fully characterize the site. Soil lithology must be recorded during the boring procedure. Samples must be analyzed for VOC's. In addition, soil must be sampled for the following parameters; soil texture, organic carbon content, porosity, permeability, moisture content, hydraulic conductivity, bulk density, particle size distribution.

One critical factor used to determine the feasibility of Soil Vapor Extraction technology is the vapor flow rate that can be induced at the site. The vapor flow rate is directly dependent upon the air permeability, which is the measure of the ability of vapors to flow through porous media. The RFI must include air permeability testing of the soils for which Soil Vapor Extraction is being proposed. Field Methods to obtain this data are provided in the publication titled "Soil Vapor Extraction Technology, Reference Handbook", EPA/540/2-91/003, February 1991.

Quality Control Procedures which will be utilized in Sampling should be delineated in the Sampling Plan to include but not be limited to:.

appropriate weather conditions: ambient temperatures above 40 degrees Fahrenheit, low humidity, stable

atmospheric conditions, etc. Weather conditions, as well as background VOC's must be recorded during the soil gas survey.

calibration of equipment
purging procedures
decontamination procedures
time frame from collection of gas sample to field GC analysis (maximum 2 hours)
means to seal hole at top (molding clay, etc.)
sample labelling and recording

FORMER DISPOSAL AREA (FDA)

The approved workplan(s) dated July 19, 1989 and October 16, 1989 stated that a total of 4 soil borings would be conducted around the perimeter of the FDA. In addition to conducting OVA scanning at each of these locations, the Workplan stated that a minimum of one to two samples would be collected and analyzed for VOC's. The seventh bimonthly progress report provided a brief overview of the OVA readings for this area. The depths at which samples were collected as well as the laboratory summaries must be provided.

The seventh bimonthly progress report identifies the locations of surface soil and surface water sample locations. Once again, Chemclene must provide the laboratory summaries for this sampling event. In addition, the RFI Report must demonstrate that QA/QC procedures, holding times, etc. were adhered to for all sampling and analysis.

Upon receiving the laboratory reports, EPA will be in a position to determine if additional sampling of the soils and water in the Former Disposal Area is required.

OTHER REQUIREMENTS TO COMPLETE RFI/CMS

The purpose of the RFI is to determine the nature and extent of releases of hazardous waste or constituents at the facility and to gather all necessary information to support the Corrective Measures Study. The CMS must include a Human Health Risk Assessment and an Environmental/Ecological Assessment. EPA is in the process of assigning a Toxicologist to your facility to review the current reports and data. Upon his/her review, EPA may require additional information to insure that there is sufficient data to conduct these assessments. In the interim, we recommend that Chemclene obtain a copy of the document entitled "Risk Assessment Guidance for Superfund" (RAGS).

ORIGINAL

6

A revised sampling plan must be submitted to EPA. In accordance with Section VI of the 3008(h) Consent Order, Chemcene has 15 calendar days, from receipt of this letter, to meet with EPA to discuss this work. If you have any questions, please feel free to call me at (215) 597-3217.

Sincerely,

Katherine A. Lose

Katherine A. Lose
Corrective Action RCRA
Enforcement Section

cc: Tom Buntin, EPA
Christopher Pilla, EPA
Cecil Rodriguez, EPA
Sherry Gallagher, EPA
Dave Fennimore, Earth Data
Don Reimenschneider, East Whiteland Twnshp
David Ewald, PADER
Paul Panek, PADER

Attachment: Ltr dtd 2/20/91

R - III Filings - Exhibit # 66
Malvern TCE - Springridge Mgmt
Lien Record CERC-III-98-011L



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Maureen 15933
ORIGINAL

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JUN 5 1992

W. Lloyd Balderston
Chemclene Corporation
258 N. Phoenixville Pike
Malvern, PA 19355

RE: RCRA §3008(h) Corrective Action Order
U.S. EPA Docket No. RCRA-III-010-CA
RCRA Facility Investigation

Dear Mr. Balderston:

EPA informed you, by letter dated November 14, 1991, that there is work that has not been completed which was proposed in the approved workplan(s) (RFI Workplan dated July 19, 1989, and RFI Workplan Addenda dated October 16, 1989 and April 22, 1991). In addition, EPA's November 14, 1991 letter identified a number of data gaps which need to be satisfied before a corrective measure study can be completed and a remedy can be selected. This letter summarizes the progress of the RFI and identifies the work still required to complete the RFI. This work is required by the terms of the referenced Corrective Action Consent Order to insure that the investigation provides sufficient data to evaluate and select remediation alternative(s).

Due to lack of progress in completing the RFI and Corrective Measure Study (CMS), EPA intends to complete the Corrective Action work at the Facility under its CERCLA authority. The justification for this action is given below.

CONCERNS

EPA questions the ~~and~~ ability and motivation of Chemclene Corporation (Chemclene) to complete the work required by the Consent Order. The documents that have been submitted in response to EPA's oversight comments are typically technically deficient documents which are shorter in length than the technical oversight comments. The figures that are attached to the workplans, are nothing more than computer sketches making it impossible to verify sampling and well locations in the field. Financial constraints of the Corporation have been the primary justification for the phased approach to the investigation that has so far provided inadequate information on the extent of contamination.

It is very likely that remediation of both soil and ground

water will be required at the site. The high levels of soil contamination at the site are likely to be acting as a continuing source of contamination to the ground water. Given this, EPA questions the ability of Chemclene to complete the remediation of the site, since site remediation is likely to be far more costly than the RFI investigation or the CMS.

BACKGROUND

Ground-water Investigation

Of the four rounds of ground-water sampling proposed in the RFI Workplan, the second round was to include PCB's and a Modified Appendix IX analysis. If the results were positive for any of the constituents in the Modified Appendix IX analysis, the remaining 2 rounds of ground-water sampling as well as the soil sampled from the soil borings were to be analyzed for these parameters. To date, Chemclene has not provided information to EPA concerning this analysis.

EPA notified Chemclene by letter dated November 21, 1990 that, based on the result of the first round of ground-water sampling, additional monitoring wells were required, as proposed in the approved workplan. This letter required Chemclene to submit a plan within 30 days to identify appropriate monitoring well locations. In Chemclene's bimonthly progress report, dated January 24, 1991, there is a brief summary of projected work. On February 20, 1991, EPA notified Chemclene that the brief summary with a computer "sketch" which marked a spot for a well was unacceptable. This letter delineated specific criteria to be used in the selection of locations for monitoring wells. The letter stated that "Failure to meet the specified due date may result in the imposition of stipulated penalties..." On April 22, 1991 EPA received an "Addendum to the RFI Workplan" for the drilling of additional monitoring wells, which was approved by EPA on April 24, 1991.

Upon installation and development of the ground-water monitoring system, the workplan proposed an evaluation of the phreatic zone by conducting a pump test. During a December 3, 1991 meeting, EPA discussed the installation of a well between the Chemclene property and the Hillbrook Circle Residences to determine if there is hydraulic communication and if the contamination is migrating in the direction of Hillbrook Circle. At the time, EPA conceded to a pump test as an initial step in lieu of a monitoring well. If the pump test revealed hydraulic communication, then Chemclene would install a monitoring well. To date, this work has not been completed.

Data from the area wells was to be used to construct a potentiometric map(s) and identify off-site downgradient wells. Once the wells were identified, the workplan proposed to conduct sampling of the off-site wells. During our December 3, 1991

meeting, Chemclene identified a number of off-site wells which could be candidates for off-site sampling. To date, Chemclene has not provided a written proposal for sampling off-site wells. EPA has received existing ground-water quality data from the Firestone warehouse, located on Lee Boulevard. The data was sent to you on April 30, 1991. This is not a substitution for characterization by Chemclene of the extent of off-site ground-water contamination.

Interim Measures at the Mounded Area

On January 26, 1990, EPA required Chemclene to submit a workplan to address the removal of the buried drums. The first Workplan for the Investigation & Remediation of the Mounded Area is dated March 5, 1990 and was severely deficient. After two more revisions, EPA approved the "Drum Removal and Remediation Plan of the Mounded Area at Chemclene Corporation" (August 24, 1990), on September 7, 1990.

The workplan proposed post-excavation samples once the drums were removed. The purpose of post-excavation sampling was to determine if the contaminated soils had been removed. Several weeks after the drums were removed, the samples were still not collected. EPA notified Chemclene by telephone that the samples had to be collected below the surface, since the surface contaminants would have volatilized at this point in time.

Analysis of the post-excavation soil samples reveal that the soils are severely contaminated with Volatile Organic Compounds. The approved Remediation Plan proposed a vacuum extraction pumping system (VEPS) with an activated carbon unit to remove organic air contaminants. To date, this work has not been completed.

Soil Contamination

In EPA's letter dated April 22, 1991, EPA required that Chemclene submit a Workplan to delineate the horizontal and vertical extent of the soils contamination in the Mounded Area within 30 days. EPA received a workplan, consisting of one paragraph, on May 23, 1991. On June 24, 1991, EPA notified Chemclene that the proposed workplan was unacceptable and recommended a meeting.

On July 3, 1991, EPA met with Chemclene and their consultant at the site to discuss the Workplan. EPA received a revised Workplan dated September 10, 1991, to investigate the soils contamination in the Mounded Area. On November 14, 1991, EPA issued detailed comments concerning the investigation of the extent of the soils contamination at the Mounded Area, the FDA, and the Plant Area, as well as other data gaps for the completion of the RFI. EPA discussed the importance of doing a soil gas

survey in conjunction with soil borings to define the vertical and horizontal extent of the contamination throughout the facility, as well as to verify that the Vapor Extraction System was applicable to the soils in the Mounded Area.

CURRENT STATUS

During the last week of December, EPA received a response to its November 14, 1991 letter. The letter, three pages in length, discussed proposed work to address the following:

Off-site investigation,
Ground water,
Domestic Water, and
Soil Sampling.

This short letter does not sufficiently address the concerns and data gaps raised by EPA to date.

The initial RFI workplan contained a time schedule which proposed completion of the RFI by January 1991. To date, Chemclene has never requested an extension of time and has never given an explanation for delayed sampling (one year time frame between ground-water sampling events). As of this writing, EPA has not received a bimonthly progress reports since September 1991.

To date, EPA has not received any raw laboratory data to verify the laboratory summaries and is concerned that verification of the raw data may not pass the QA/QC procedures.

WORK TO BE PERFORMED

The following work is required to comply with the terms of the Consent Order so that the extent of soil and ground-water contamination can be defined and the RFI can be completed. Additional details on the requirements are contained in EPA's November 14, 1991 letter (attached).

1. Provide the Modified Appendix IX Analysis for all on-site monitoring wells.
2. Conduct the Pump test proposed in the RFI Workplan. A plan to treat and dispose of the contaminated ground water must be provided. This plan must be in compliance with State and Federal environmental regulations.
3. Prepare and submit a Potentiometric map that includes data from off-site wells.
4. Prepare and submit a proposal which addresses sampling and analysis of off-site wells.

5. Prepare a workplan that addresses EPA's comments in the November 14, 1991 letter concerning evaluation of the soils in the plant area, the FDA, and the Mounded Area. This workplan must include both a soil gas survey as well as soil borings for evaluation of the soils. The evaluation must define both the VERTICAL and HORIZONTAL extent of contamination in order to determine the type of remediation that will be required for both soil and ground water. Specific sampling locations, depths, etc. for each of the sampling/surveying methods must be provided on a drawing. The drawing must be drawn to scale, identify the area which has been excavated in the Mounded Area and the FDA, and identify 5 foot contour intervals.
6. Conduct sampling of the domestic wells in the vicinity of Hillbrook Circle. This includes all residential wells listed on Table 4 of the RFI Workplan (July 19, 1989) and any additional wells that are now in that area. Although EPA's November 15, 1991 letter directs you to sample only certain wells, a complete resurvey is appropriate since the last survey was conducted almost 12 years ago. Contaminated ground water may have migrated to wells that were not contaminated 12 years ago. Information submitted to EPA in February 1992, by Counsel to the residents of 23 Hillbrook Circle, indicates that this is occurring.
7. Provide data verification for all samples and analysis conducted to date.
8. Secure the excavation at the mounded area with fencing or provide proper grading and cover, since the soil remediation proposed in the August 24, 1990 workplan has not been executed. The open pits and the highly contaminated soils present both a safety and toxicity hazard. The gate to the FDA must also be modified to prevent entry under the gate. A child could easily gain access to the open pits by slipping under the gate.
9. Provide a separate summary for work conducted to date concerning the sampling and analysis of soils and water in the Former Disposal area. This summary must provide a table which identifies analytical results for each of the sampling locations as well as a figure that delineates the sampling locations. Laboratory summaries must be attached to this report.
10. Provide a timetable to implement all of the above and to submit a comprehensive RFI report and a CMS report.

All of the above reports and workplans must be prepared in a

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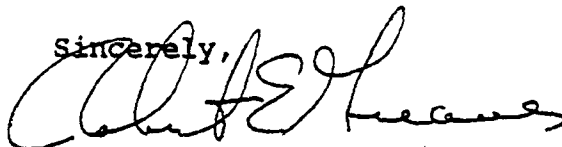
6

manner consistent with Attachment 3 of the Consent Order - Scope of Work for a RCRA Facility Assessment at Chemcene. The RFI Report must also include an investigation analysis to establish clean-up standards for protection of human health and the environment (Task 5 of the Scope of Work). An EPA toxicologist will review the proposed clean-up standards.

In accordance with Section VI of the 3008(h) Consent Order, Chemcene has fifteen (15) calendar days from receipt of this letter to meet with EPA to discuss this work and EPA's decision to complete the Corrective Action work under EPA CERCLA authority. Unless Chemcene provides evidence that all remaining work will be accomplished by Chemcene in a timely, complete and technically proficient manner, the project will be transferred to the CERCLA program at the end of the fifteen (15) calendar days.

If you have any questions, please feel free to contact Maureen Essenthier, Project Manager, at (215) 597-2745.

Sincerely,



Robert E. Greaves, Chief
RCRA Enforcement/UST Branch

Attachment

cc: Chris Pilla, EPA (3HW64)
Tom Buntin, EPA (3HW64)
Cecil Rodrigues (3RC31)
Peter Schaul, EPA (3HW20)
Anthony Dappolone, EPA (3HW27)
Sherry Gallagher, EPA (3HW27)
David Ewald, PADER

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

15930
ORIGINAL

SUBJECT: Chemcene Corporation, Malvern, PA
Meeting Notes - Proposed Transfer to
CERCLA

DATE: 6-30-92

FROM: Maureen Essenthier, Project Manager
PA Corrective Action Section (3HW64)

TO: File

A meeting was held to discuss EPA's June 5, 1992 letter to Chemcene. The letter notified Chemcene of EPA's intent to transfer the project to the CERCLA program due to lack of progress (3.5 years) in completing the RFI.

I opened the meeting by explaining that EPA is unhappy with the progress of the RFI. Since drinking water wells are affected, it is necessary to complete the RFI and move on to remediation without undue delay. In particular, delays have been caused by debates over the necessity of field work that Chemcene (Lloyd Balderston, Pres.) cannot afford. This has resulted in excessive reduction and phasing of the RFI work. The decision to transfer the project to CERCLA was made jointly by RCRA, CERCLA, and Regional Counsel.

Rob Fox (Counsel for Chemcene) stated that additional work required by EPA has increased to time required to complete the project. Chemcene is committed to completing the RFI. Chemcene should be permitted to complete the work under the current Order, then decide on its ability to implement the remedy.

The Work to be Performed items in EPA's June 5, 1993 letter were discussed.

1. Modified Appendix IX Analysis - Chemcene (CC) believes that this has already been provided, for wells #5 and 6.

2. Conduct Pump Test - This had been proposed by CC in lieu of the immediate installation of a well between the FDA and the Hillbrook Circle area, possibly eliminating the need for the well if the results show hydraulic conductivity between the two areas. Tom Buntin agreed to start with the pump test, but he stated that the pump test may be inconclusive in showing hydraulic conductivity. If it is inconclusive, the well must be installed.

3 & 4. Potentiometric Map and Sampling of Off-Site Wells - CC conceded that on-site remediation may be required but that off-site remediation is not warranted, therefore, off-site data is not needed. I disagreed. The need for off-site contamination cannot be determined until the level and extent of contamination is known. EPA requires off-site data.

5. Horizontal and Vertical Evaluation of Soil Contamination - CC proposed to conduct a soil gas survey and soil study for vapor extraction. Only a horizontal evaluation would be conducted. I identified the minimum requirement as a H & V soil gas survey with follow-up chemical analysis of the soil (to determine the actual chemicals and concentrations). A leach test should also be conducted if high levels of contamination exist.

6. Domestic Well Sampling - CC agreed to sample all wells in the Hillbrook Circle area by EPA Method 601. CC claims that Method 601 was previously approved by EPA for domestic well analysis. I will have to check the suitability of the method.

7. Data Verification - CC proposed to include this in the RFI Report. This is acceptable to EPA.

8. Secure Mounded Area - CC proposed to fill-in the excavations. This is acceptable to EPA, however, the soils in the area may require further remediation.

9. FDA Work Summary - CC agreed to provide one.

10. Implementation Timetable - CC agreed to provide one.

I informed CC that it is also required to submit a plan for the on-going evaluation and management of contamination in domestic wells surrounding the facility. This requirement is not included in EPA's June 5 letter. The plan must include the rational for evaluation break-through on the carbon units installed on contaminated wells.

Rob Fox repeated his position that CC ability to remediate the site is not the issue. Only CC ability to complete the work in the Order is relevant.

Lloyd Balderston then agreed to initiate pumping and treatment of the contaminated groundwater in the FDA area if hydraulic conductivity is shown with the Hillbrook Circle area, if the project remains in the RCRA program.

ATTENDANCE SHEET

ORIGINAL

The Environmental Protection Agency hereby meets with Respondent,
Chemelene Corp., to discuss issues concerning
Respondent's facility/facilities located at _____
on June 30, 1992.

<u>NAME</u>	<u>ORGANIZATION</u>	<u>TELEPHONE NUMBER</u>
<u>Maureen Essenther</u>	<u>EPA-Region 3</u>	<u>(215) 597-2745</u>
<u>Christopher B Pulla</u>	<u>EPA-Region 3</u>	<u>215-597-5986</u>
<u>LLOYD BALDERSTON</u>	<u>CIDEMCLINE</u>	<u>644-2986</u>
<u>ROB FOX</u>	<u>MANCO, GOLD & KATZ</u>	<u>660-5711</u>
<u>DAVE FENNIMORE</u>	<u>EARTH DATA, INC</u>	<u>(215) 524-9466</u>
<u>Hudson S. Green</u>	<u>EARTH DATA, INC.</u>	<u>(215) 524-9466</u>
<u>Thomas J Buntin</u>	<u>EPA-Region III</u>	<u>(215) 597-2745</u>
<u>Cecil Rodrigues</u>	<u>EPA-Region III</u>	<u>215-597-4868</u>

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Malvern TCE - Springridge Mgmt
Lien Record CERC-III-98-011L



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

15927
ORIGINAL

August 21, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

W. Lloyd Balderston
Chemclene Corporation
258 N. Phoenixville Pike
Malvern, PA 19355

RE: RCRA §3008(h) Corrective Action Order
U.S. EPA Docket No. RCRA-III-010-CA
RCRA Facility Investigation

Dear Mr. Balderston:

As stated in EPA's June 5, 1992 letter to you, EPA is considering the transfer of the Chemclene Corporation (Chemclene) site remediation to the CERCLA program. During our June 30, 1992 meeting, you indicated that you are willing and able to complete the requirements of the referenced Corrective Action Order. This was reinforced in Robert D. Fox's July 2, 1992 letter, which was sent to EPA on your behalf.

EPA cannot make a final decision on the disposition of the project until a formal response is provided by Chemclene to EPA's June 5, 1992 letter. The response must specifically address all requirements in the "Work to be Performed" section of the letter. If EPA determines that the proposed scope of work and schedule for the remaining RCRA Facility Investigation work are adequate to meet the requirements of the Corrective Action Order, the project may proceed under the Order. The schedule for completion must be a firm schedule. The schedule may not be contingent upon elements not essential to the execution of the investigation. For example, you proposed the use of an injection well for disposal of water generated during the groundwater pump test. Although this disposal method is acceptable with the appropriate permits, it is not the only acceptable method of water disposal. The investigation must use methods that achieve timely completion of the required work.

In addition to the requirements in the "Work to be Performed" section of EPA's June 5, 1992 letter, Chemclene must also provide a formal plan for the assessment and management of contaminated domestic well water. At a minimum, the plan must include the monitoring of domestic well water in the vicinity of the facility, and the evaluation and replacement of the carbon filters in the homes with contaminated groundwater. A drawing must clearly show the location of all wells in the vicinity of

the facility, along with the corresponding address, laboratory sample code, and occupant of the property.

All work done under the Order must be in compliance with all applicable local, State, and Federal laws and regulations. As such, the material removed from the Mounded Area must be brought into compliance with the Pennsylvania RCRA regulations for storage and disposal of hazardous waste.

The thirteenth progress report, dated June 8, 1992, stated that "informal" results of a groundwater sample from upgradient monitoring well CC-14 showed 274 ppb of Trichloroethylene (TCE). EPA does not accept this as a background concentration of TCE in the groundwater. If the official lab results confirm this level of contamination, the workplan for evaluation of the FDA and Mounded Area must include the identification of the source of contamination.

Chemclene has fifteen (15) calendar days from receipt of this letter to provide to EPA the required information.

If you have any questions regarding this letter, please feel free to contact Maureen Essenthier, Project Manager, at (215) 597-2745.

Sincerely,

Maureen Essenthier for

Christopher B. Pilla, Chief
PA Corrective Action Section

cc: Maureen Essenthier, EPA (3HW64) ✓
Thomas Buntin, EPA (3HW64)
Cecil Rodriques, EPA (3RC31)
Anthony Dappolone, EPA (3HW27)
David Ewald, PADER
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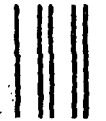
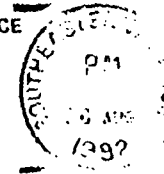
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

16018 ORIGINAL

OVERNIGHT MAIL

June 28, 1993

W. Lloyd Balderston
Chemclene Corporation
258 N. Phoenixville Pike
Malvern, PA 19355

RE: RCRA §3008(h) Corrective Action Order
U.S. EPA Docket No. RCRA-III-010-CA
RCRA Facility Investigation

Dear Mr. Balderston:

The following is a status on the work required by EPA's letters dated June 5, 1992 and August 21, 1992. The status is based on the work proposed in the Chemclene response letter (September 18, 1992) and the Fourteenth Progress Report (March 17, 1993).

This letter also establishes a schedule for the completion of the remaining work and for implementation of a groundwater pump and treat system for remediation of contaminated groundwater (Additional Work).

Status of Work - Item numbers correspond to the "Work to be Performed" items identified in EPA's letter dated June 5, 1992.

Item #1 - Modified Appendix IX Analysis - Complete.

Item #2 - Aquifer Pump Tests

a. The Former Disposal Area (FDA) and Mounded Area (MA) pump test has been completed. Although a narrative of the results was provided in the fourteenth progress report, no actual field data has been submitted. This data was requested in EPA's letter dated March 17, 1993. A concise report is required which details all physical data gathered in connection with the pump test (before, during, and after the actual pumping). The report should include potentiometric maps which show the maximum cones of influence achieved by pumping of the test well. As stated in EPA's June 5, 1992 letter, the results of the pump test will determine the need for an additional monitoring well in this area. The results will also be a component of the design for the groundwater pump and treat remediation, discussed below (Additional Work).

b. The plant area pump test, which was approved by EPA on November 17, 1992, must be implemented. If PADER will not approve the discharge of the treated water to the intermittent

stream, then another disposal method that is in compliance with State and Federal regulations must be used.

Item #3 - Potentiometric Map

A potentiometric map has been submitted based on data from the Chemclene Corp. wells and the Firestone wells. This is inadequate to show groundwater flow west of the FDA/MA, toward Hillbrook Circle. A potentiometric map is required which is based upon data gathered during 1992 which shows the hydraulic relationship among the FDA, the plant area, Hillbrook Circle, and the area between the plant and the quarry (including water level readings at all areas).

This analysis will also be used to determine whether Well CC-14, which showed 274 ppb of TCE, can be considered an upgradient well.

Item #4 - Off-site Well Sampling

The data submitted for the Firestone property off-site wells (CC-102, CC-103, CC-104, CC-105) indicate no detectible levels of contamination. No information on the depths of the monitoring zones was provided. Based upon your August 4, 1992 potentiometric map, the Firestone wells are not directly hydraulically downgradient. Consequently, groundwater flow paths from the Chemclene Corp. property are likely to be north of the Firestone property. Therefore, the extent of the contaminant plume is still unresolved. Questions regarding the nature of contaminant transport, such as depth of plume migration and solution channel flow, are still unanswered. Considering the high level of groundwater contamination at the site, additional work is required to determine the direction of migration, and the extent and concentration of the contaminant plume.

Item # 5 - Soil Investigation

Evaluation of soil contamination below the proposed 25 foot depth may be required, based on the results of the proposed sampling or if vapor extraction is warranted for remediation. Soil leach tests will also be required for soils with high contamination unless soil removal is proposed. Attachment 5 to the September 18, 1992 workplan states that the data will be presented in a Tier II format. This format is not described or shown. The data should be presented in the format included in the approved Workplan (October 16, 1989 Addendum), unless the Tier II format is submitted and approved.

- a. The soil sampling plan for the FDA/MA has been completed.
- b. The soil sampling plan for the plant area must be expanded in order to locate the source of the high levels of organic contamination in the groundwater; particularly PCE, TCE, and 1,1,1-TCA. It must include the area with high soil gas readings (601 to 1035 ppm on the gas chromatograph) that is located adjacent to the one-story block building. This area is identified as the "Area of Condensate Water Disposal" on Figure 2 (6-21-89) of the RFI Workplan. The procedure described for the former underground tank area should be used; i.e., start at the

area of highest soil gas concentration and move outward until low VOC concentrations are detected. The analysis for the plant area must be expanded to include aromatic volatile organics and methylene chloride. This is required since gasoline and methylene chloride have been stored in underground tanks at the plant; and because benzene, toluene, xylene and methylene chloride have been detected in some soil samples and in water samples from wells CC-7 and CC-13. These contaminants may also be present in other areas, but may be masked by the high concentrations of other contaminants.

Item #6 - Domestic Well Sampling

Previously submitted drawings of wells in the area of the FDA/MA identify wells that were not sampled during 1992. They are identified as # 12, 16, 31, 32, 66, 67, 70, and an unnumbered well between 31 and 32. The nature of these wells must be identified (and/or updated from the RFI Workplan), and they must be sampled if they may be used for domestic purposes.

The information submitted to EPA on the sampling results does not indicate how or when the home owners/occupant were notified of the results.

Item #7 - Data Verification

As proposed, this may be provided with the RFI Report.

Item #8 - FDA/MA Security

The flexible plastic fencing around the MA is not adequate to prevent entry to the area. A security fence similar to that surrounding the FDA, or proper grading and cover for the MA must be provided immediately to prevent entry to the excavations and exposure to contaminated soil/water.

Item #9 - FDA Data Summary

Complete.

Item #10 - Timetable

Complete.

Additional Requirement (EPA Letter - August 21, 1992) - Domestic Well Assessment and Management Plan

An Assessment and Management Plan has not been provided. Attachment #6 to Chemclene's September 18, 1992 letter provides information on domestic wells in the FDA/MA area, but this does not constitute an Assessment and Management Plan. The written plan must be adopted to assure that residents are not exposed to unacceptable levels of chemical contamination. The following elements must be included in the plan:

a. Propose a sampling schedule for analysis of the domestic wells in the area. Those wells in closest proximity to the FDA/MA and to wells that already show contamination must be sampled at least twice a year. Other wells may be sampled less frequently.

b. Provide an updated list of homes with carbon filters;

identifying the type, capacity, and installer of the filter.

c. Provide the past and future maintenance schedule for the filters. Include those homes with filters installed by the owners. The basis for the maintenance schedule must be justified. The fourteenth progress report identifies the most highly contaminated well (#41) and a high use well (#9) as appropriate wells for break-through analysis. The identification of well #9 as a high potential for early break-through is not justified. A evaluation of exhaustion rate was described as being underway in the Dames and Moore response letter, dated October 16, 1989. This evaluation was to include daily usage rates and contaminant concentrations to determine the efficacy of the maintenance schedule. If this information has been submitted, provide the date of submission or a copy of the information.

d. Establish criteria for taking remedial action and the action to be taken.

e. Establish the procedure and timeframe for notification of the well owner/resident of the sample results.

f. Provide a description of the survey method used to establish the locations of the domestic wells in the area. In particular, the area east of the Chemclene property must be addressed since that is the documented direction of groundwater flow from the contaminated plant area.

Additional Work

As discussed previously, EPA is requiring that Chemclene Corp. initiate remediation (pump and treat) of contaminated groundwater beneath the plant and FDA/MA areas under the "Additional Work" provision of the Corrective Action Order. The remediation is required due to the high levels of contamination that exists, the contamination of domestic water wells, and the potential for further migration of the contaminant plume. The design and construction schedule is as stated below. The system design must include a system schematic, pumping rates with related hydrogeologic information, and details of the treatment and disposal system.

Schedule for Work Completion

The following schedule is established based on the timeframes in Chemclene's September 18, 1992 workplan and the provisions of the Consent Order. The timeframes are days from the date of receipt of this letter.

Progress Report (past due) - 15 days

Item #2 - Submit the FDA/MA pump test report (past due) - 15 days

Item #2 - Implement Plant Area Pump Test (past due) -

Immediately, to be completed within 30 days

Item #3 - Submit a potentiometric map, as described above
- 15 days

Item #4 - Submit a proposal to document contaminant plume
migration from plant area - 30 days

Item #5 - Implement plant area soil investigation, with the
modifications noted in Item #5 (above) - immediately,
to be completed within 45 days

Item #6 - Identify how home owners/residents were notified
of well sampling results, and propose sampling of those
wells that were not sampled during 1992 (or provide an
explain why sampling is not warranted) - 15 days

Item #8 - Secure Mounded Area (past due) - immediately, to
be completed within 15 days

Additional Requirement - Submit Domestic Well Assessment and
Management Plan (past due) - 30 days
- Resample domestic wells in the vicinity of the
contaminated wells - 60 days

Additional Work - Submit design for the groundwater
remediation (pump and treat) system - 45 days

EPA will take split samples of the domestic well
sampling, therefore the sampling schedule must be submitted
and approved by EPA prior to execution.

If you have any questions regarding this letter, call
me at 215-597-2745.

Sincerely,



Maureen Essenthier
PA Corrective Action Section
Hazardous Waste Management
Division

cc: Christopher Pilla, EPA (3HW64)
Tom Buntin, EPA (3HW64)
April Flipse, PADER
Dustin Armstrong, PADER

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File

1601 ORIGINAL

September 20, 1993

FEDERAL EXPRESS OVERNIGHT MAIL

W. Lloyd Balderston
Chemclene Corporation
258 N. Phoenixville Pike
Malvern, PA 19355

RE: RCRA §3008(h) Corrective Action Order
U.S. EPA Docket No. RCRA-III-010-CA
RCRA Facility Investigation

Dear Mr. Balderston:

In response to EPA's 6/28/93 letter addressing the remaining RFI work for the referenced project, Chemclene has submitted letters dated 7/22/93, 7/28/93, 8/1/93 (misdated 8/31/93), 8/6/93, 8/12/93, and 8/26/93. This letter responds to Chemclene's letters and provides an updated status of the remaining work.

ADDITIONAL WORK/GROUNDWATER STABILIZATION

~~EPA's 6/28/93 letter notified you that groundwater stabilization (pump and treat of contaminated groundwater) is being required under the "Additional Work" provisions of the referenced Order.~~ Chemclene's response, dated 7/22/93, states that insufficient data is available to design pump and treat systems, and that this task should be part of the remediation phase (if warranted). However, the pump test data at the Plant Area is the only data that is specifically cited as missing. This is not an adequate justification to defer work on groundwater stabilization since the pump test workplan for the Plant Area was approved by EPA on 11/17/92. The work should have been completed within the one month time frame established in your 9/18/92 workplan schedule.

EPA maintains that groundwater stabilization is warranted at this time due to the high levels of groundwater contamination that exist at the site, the contamination of domestic water wells, and the potential for further migration of the contaminant plume. The highly contaminated groundwater at the Plant Area and the Former Disposal Area/Mounded Area (FDA/MA) should be pumped to contain the contaminant plumes and to initiate the clean-up of the aquifer.

FDA/MA - Contamination of the groundwater in the Hillbrook Circle area has been documented since 1980, when nine home wells showed contamination. Three additional wells (#55, 57, and 65) now show

levels of Trichloroethylene (TCE) contamination above the EPA drinking water standard of 5 parts per billion (ppb). Trace amounts of 1,1,1-Trichloroethane (TCA) have been found in four additional wells (#45, 46, 69, and 100), and 1,1-Dichloroethylene (DCE) in one additional well (#46). TCA is a contaminant found in groundwater at the FDA/MA. 1,1-DCE is a degradation product of TCE.

The FDA/MA pump test report, Interim Report on the Results of Pumping Tests on Chemclene Corporation Monitoring Well CC-05 (August 1993), confirms a hydraulic connection between the FDA/MA and contaminated wells in Hillbrook Circle. During Chemclene's 6/30/92 meeting with EPA and EPA's 4/28/93 site inspection, you agreed to the implementation of groundwater stabilization at the FDA/MA if a hydraulic connection were established between the FDA/MA and Hillbrook Circle.

The FDA/MA pump test report expresses concern over the reinjection of treated groundwater into well CC-14. EPA shares this concern due to the significant level of contamination detected there. An injection well farther upgradient should be considered. The design of the pump and treat system must take all such technical matters into consideration.

PLANT AREA - The extent of the highly contaminated groundwater plume under the plant area has not yet been defined. Water samples from monitoring well CC-6 have contained up to 62,000 ppb of TCE, with a trend of increasing contamination over time. Contamination of this magnitude must be contained to prevent the further degradation of the aquifer.

AQUIFER PUMP TESTS

FDA/MA PUMP TEST - The FDA/MA pump test report was provided to EPA on 8/12/93. Chemclene's 7/22/93 letter originally deferred the submission of the detailed data until the RFI Report. This response indicates that you have lost sight of some of the RFI goals due to the extensive phasing of the RFI work. This phasing approach has been gradually approved by EPA in response to your repeated requests in order to keep investigation costs to a minimum. The pump test data is required not only to evaluate a pump and treat system, but also to determine the need for an additional monitoring well as part of the RFI investigation. By letter of 11/14/91, EPA required the installation of a bedrock well between the Former Disposal Area (FDA) and the Hillbrook Circle area to determine if hydraulic communication exists between these two areas. In your letter of 6/5/92 and during our meetings of 12/3/91 and 6/30/92, you requested that the pump test be conducted prior to installation of the well. If hydraulic communication was found during the pump test, then the additional well would not be required. EPA agreed to Chemclene's proposal regarding the pump test provided that Chemclene commit to an additional monitoring well if the pump test was inconclusive.

regarding hydraulic conductivity. The pump test data was due to EPA with the progress report following the pump test (i.e., within two months of the completion of the pump test). EPA formally requested this data on March 17, 1993 and June 28, 1993, but received only a narrative summary with the fourteenth progress report (3/17/93).

EPA's hydrogeologic review of the FDA/MA pump test data concludes that groundwater flow paths, in the form of fractures and/or solution channels, exist between the FDA/MA and Hillbrook Circle. The contaminated groundwater at the FDA/MA can provide a continuing source of contamination to the residential wells in the area. Therefore, the groundwater should be stabilized (initiate pump and treat) to cut off the source of contamination.

PLANT AREA PUMP TEST - The workplan for this test was approved by EPA on 11/17/92, and was to be completed within one month (based on the 9/18/92 workplan schedule). The Plant Area pump test was identified as "past due" in EPA's 6/28/93 letter, and completion was required by 7/29/93. No justification is given for the extensions requested on 7/22/93 and 8/26/93. These extensions are therefore denied.

POTENTIOMETRIC MAP

A potentiometric map incorporating the Hillbrook Circle area, the FDA/MA, and the Plant Area was required in EPA's 6/28/93 letter. Although this is still desirable, the FDA/MA pump test report has adequately characterized the groundwater flow paths in the Hillbrook Circle area and FDA/MA. Therefore, the facility-wide potentiometric map will not be required unless a specific need for such information arises in the future.

The background potentiometric map for the FDA/MA (in the Interim Report on the Results of Pumping Tests on Chemclene Corporation Monitoring Well CC-05) does not show monitoring well CC-14 to be upgradient of the contamination sources. In addition, TCE contamination of 274 ppb has been documented in well CC-14. As notified in EPA letters dated 11/14/91 and 8/21/92, EPA does not accept such high levels of contamination as background levels. Therefore, an additional upgradient well is must be installed as a background well.

OFF-SITE WELL SAMPLING

EPA's 6/28/93 letter requests a proposal to identify the contaminant plume migrating from the Plant Area. A proposal has not been submitted. Chemclene's 8/6/93 letter identifies six wells that you judge to be "outside the area of concern" (see comments on Chemclene letter dated 7/22/93, below). The purpose of your 8/6/93 letter is unclear, but is does not qualify as a proposal to identify the contaminant plume.

Chemclene's 7/22/93 response indicates that you have lost sight of the purpose of sampling the Firestone wells. The purpose is to identify the extent of the contaminant plume. Your 7/22/93 letter states that the Firestone wells have been sampled and that other existing wells "are outside the area of concern". Since the extent of the contaminant plume is unknown, the area of concern is also unknown. Chemclene is required to identify the extent of the contaminant plume. Your 7/22/93 letter is completely unresponsive to this requirement. If this cannot be accomplished with existing wells, then new wells must be installed.

SOIL INVESTIGATION

FDA/MA - EPA's 6/28/93 letter states that the soil sampling for the FDA/MA has been completed. However, they were not properly taken. A review of the sampling information submitted with your fourteenth progress report (3/17/93) shows that the samples were not taken from the locations in the 9/18/92 workplan (see Attachment 5, Figure 2 of the workplan). The workplan identifies three sampling points within the trench where waste was buried and where highest contaminant concentrations might be expected. The sampling results (Figure 2 of the fourteenth progress report) show no samples were taken within the waste trenches. These samples must be taken in accordance with the methodology described in the workplan. In addition, samples shall also be taken from each of the smaller trenches.

As previously stated in EPA's 6/28/93 letter and at our 6/30/92 meeting, soil with high concentrations of contamination must be subjected to a Toxicity Characteristic Leaching Procedure (TCLP). This is required to determine the potential for continuing releases of contamination from the contaminated soil to the groundwater. Soil samples 4-9 and 4-25 show high levels of contamination, therefore, TCLP tests are required.

PLANT AREA - The 9/18/92 soil sampling plan for the Plant Area was approved on 6/28/93 with the modifications described in that letter. If this sampling does not identify the source of contamination, additional investigation will be required. The source of contamination is particularly relevant since some wells in this area are showing increased contamination over time.

This work was to be completed within 45 days of EPA's approval. No technical justification is provided for your 7/22/93 extension request until 9/20/93. Therefore, the request is denied.

DOMESTIC WELL SAMPLING

EPA's 6/28/93 letter required the sampling of domestic wells # 12, 16, 31, 32, 66, 67, 70, and 71. Your 8/1/93 response states that these wells "are not in the affected area". Since the affected area may change and has changed over time, the

currently affected area can only be assessed by sampling of the well water. The limestone aquifer beneath the facility makes contaminant migration difficult to predict. As previously noted in EPA's 9/10/93 letter, EPA sampled the noted wells on 9/15/93, with the exception of wells #16 and 67 (which have filters).

DOMESTIC WELL ASSESSMENT AND MANAGEMENT PLAN

The following information or modification of the plan submitted on 8/1/93 is required.

1. Sampling Schedule - Wells #20 and 53 must be added to the list of wells to be sampled twice a year. Well #20 does not have a filter and there are no wells being monitored between the FDA/MA and that well. Well #53 is adjacent to a well with documented contamination. Any wells with filters that are not maintained by Chemclene (i.e., wells that do not show contamination based on Chemclene analysis) must also be analyzed twice a year.

Other unfiltered residential wells must be sampled every 12 months to detect contamination that may by-pass the wells that will be monitored twice a year.

Post-filter sampling must be conducted on wells #41 (highest contamination) and #9 (high use). Although post-filter sampling of these two wells is identified in other Chemclene correspondence, it is not specified in this plan. Post-filter sampling should be conducted nine months after the filter media is changed and prior to media change (at 12 months).

2. Filtered Wells - Provide the absorption capacity of the Aqua-Pure filters; i.e., what amount of chemical contaminant can be absorbed before breakthrough is expected. Manufacturer information should be provided to document the absorption capacity.

3. Filter Maintenance Schedule - Identify the number of residents using well #9.

4. Domestic Well Survey Method - Your letters, dated 8/1/93 and 8/6/93, indicate that a survey of groundwater wells east of Plant Area has been conducted. Identify on a scale drawing the exact area surveyed and locate the wells identified. Provide the name and address of the wells that have been located.

PROJECT STATUS

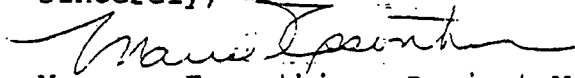
The investigation of contamination at the site and implementation of groundwater stabilization is not proceeding at an adequate pace. Many issues still remain unresolved, as described above. EPA is currently evaluating enforcement options to complete environmental clean-up at the site in a more expeditious manner.

ORIGINAL

6

If you have any questions regarding this letter, call me at 215-597-2745.

Sincerely,



Maureen Essenthier, Project Manager
PA Corrective Action Section
Hazardous Waste Management
Division

cc: Robert Greaves, EPA (3HW60)
Christopher Pilla, EPA (3HW64)
Jean Kane, EPA (3RC32)
Tom Buntin, EPA (3HW64)
Peter Schaul, EPA (3HW20)
April Flipse, PADER
Dustin Armstrong, PADER



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1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Paul Boni, Esq.
Constitution Place
Suite 1109
325 Chestnut St.
Phila, PA 19103

4a. Article Number

2 396 670 405

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Insured |
| <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD |

7. Date of Delivery

12-3

5. Received by: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

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PHILADELPHIA, PA 19103-2029
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Renardo